

# ALSTON & BIRD

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February 7, 2021

The Honorable Ramon E. Reyes, Jr.  
Magistrate Judge  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: 1:20-cv-02205-MKB-RER – Group One Ltd. v. GTE GmbH  
Request for Adjournment of February 9, 2021 Initial Conference

Dear Judge Reyes:

Defendant GTE GmbH respectfully requests a two-week adjournment of the February 9, 2021 initial conference and February 8, 2021 deadline to submit a Case Management Statement set by the Court's February 3, 2021 Scheduling Order. This time is needed in order to allow for Defendant, located in Germany, to fully confer with counsel, which it has not been able to do to date. Plaintiff Group One Ltd. has been notified of this request and does not consent to it as we understand, but has not provided a reason. Pursuant to the Scheduling Order, this request is being submitted more than forty eight (48) hours before the February 9, 2021, 10:30am conference was to begin.

Respectfully submitted,

/s/ Karl Geercken

Karl Geercken

*Attorney for Defendant*

KG:nm